

**IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY**

**THE STATE OF MARYLAND**

**vs.**

**RASHID MARWAN MOSBY  
AKA "Sean Mayo" AKA "Rock"  
AKA "Slick" AKA "Slicky P"  
AKA "Daddy" AKA Fleetwood**

**DEFENDANT**

---

**INDICTMENT**

The Grand Jury for the State of Maryland, sitting in Prince George's County, Maryland, upon their oaths and affirmations avers and alleges that Rashid Marwan MOSBY, along with Joshua Isaiah JONES, Terra PERRY, and other persons known and unknown, from on or about and between the dates of January 2013 through December 2015, at various locations throughout the State of Maryland including, but not limited to, Prince George's County, Maryland, did knowingly, intentionally, and unlawfully combine, conspire, confederate and agree to engage in human trafficking: to take or cause another to be taken to any place for prostitution and place, cause to be placed, or harbor another in any place for prostitution and persuade, induce, entice, or encourage another to be taken to or placed in any place for prostitution and violate Section 11-303(a) involving a victim who is a minor and receive or acquire money or proceeds from the earnings of a person engaged in prostitution with the intent to profit from a crime under Subtitle 3, in violation of the common law of Maryland and the Criminal Law Article, Section 11-303 and Section 11-304, contrary to the form of the Act of Assembly in such case made and provided, and against the peace, government and dignity of the State.

**BACKGROUND**

1. Trafficking of women for prostitution is a widespread practice that places vulnerable individuals including juveniles and the indigent at risk of sexual exploitation and violence. Around the world, human trafficking has taken a variety of forms but often involves the recruitment, transportation, abduction, deception, and coercion of victims who are physically, psychologically, and sexually abused and exploited for the financial gain of criminal enterprises. Today, traffickers commonly use the internet to lure victims from faraway cities, to solicit customers, and to mask their identities from law enforcement.

METHODS OF THE CONSPIRACY

2. As part of a human trafficking operation dating back to 2013, DEFENDANTS Rashid Marwan MOSBY, Terra Marie PERRY, and Joshua Isaiah JONES, along with others known and unknown, recruited, transported, manipulated, and threatened women who performed sex acts in exchange for money under the direction and for the financial gain of the DEFENDANTS.

3. Describing themselves as an escort service named "Pink Pleasure Entertainment," DEFENDANTS placed online advertisements on Backpage.com to identify women whose sexual services DEFENDANTS intended to sell for profit.

4. In response to women who answered advertisements, DEFENDANTS arranged and paid for transportation of their victims to the State of Maryland. The traffickers, once they had removed the women from familiar surroundings, would control and direct the location and movement of their victims at all times.

5. After being brought to Maryland, DEFENDANTS also paid for, among other items, their victims' food and lodging and then claimed these expenses as unspecified debts that the women would have to pay off before being free of DEFENDANTS.

6. Consistently using the email addresses xxxx.xxxx13@yahoo.com and pinkpleasureentertainment@gmail.com, victims' telephone numbers and the telephone number xxx-xxx-6754, DEFENDANTS posted on Backpage.com online listings with sexually explicit images and sexually explicit language to solicit customers for sexual services arranged by DEFENDANTS and performed by victims provided by DEFENDANTS.

7. In response to men who answered these listings, DEFENDANTS arranged for hotel rooms at various locations in Maryland, transported women to the selected establishments, assisted with the setting and negotiation of prices, and collected funds afterwards. DEFENDANTS told their victims that the money went toward the debt the women had incurred for food, lodging, and transportation to and within Maryland.

8. At times, DEFENDANTS threatened the women, forbade them from returning home, and withheld money on the ground that the victims would only receive the portion to which they were entitled once they returned to their home state.

9. From 2013 to 2015, DEFENDANTS placed over a hundred separate online listings on Backpage.com using these specific yahoo and google (gmail) email addresses and specific telephone number, with each advertisement offering escort services for money and many containing sexually explicit images and sexually explicit language.

10. From 2013 to 2015, DEFENDANTS rented dozens of rooms from among a rotating list of hotels and motels in Maryland including Days Inn, Econo Lodge, Holiday Inn, Howard Johnson, Knights Inn, Ramada Inn, and Super 8.

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

Victim A (AR D.O.B. 04/1990, AKA Vanilla/Juice)

11. Prior to January 8, 2013 MOSBY met Victim A online and began grooming her for prostitution by initially engaging her in sexual relationship under the auspices of a dating relationship. During this stage, Victim A shared her financial problems and MOSBY persuaded her to begin selling herself for sexual acts on Backpage.com.

12. MOSBY advised Victim A on what to say to men who responded to the listing and directed the victim to give to MOSBY all proceeds from paid sexual encounters she had with men who answered the Backpage.com advertisement.

13. On January 8, 2013, at 5:09 p.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, picturing Victim A using the email address xxxx.xxxx13@yahoo.com.

14. On January 13, 2013, at 12:47 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, picturing Victim A, using the email address xxxx.xxxx13@yahoo.com.

15. On January 29, 2013, at 6:50 p.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, picturing Victim A, using the email address xxxx.xxxx13@yahoo.com.

16. MOSBY routinely slapped and occasionally beat Victim A.

Victim B (MA D.O.B. 10/1986, AKA Jasmine)

17. Prior to June 18, 2013 MOSBY met Victim B online, while she was living in New Jersey, and began grooming her for prostitution by initially engaging her in a sexual relationship under the auspices of a dating relationship. During this stage, Victim B shared her financial problems and MOSBY persuaded her to begin selling herself for sexual acts on Backpage.com.

18. On June 18, 2013, MOSBY transported Victim B to a Days Inn in College Park, Maryland where he rented one hotel room for two nights.

19. At the hotel room, MOSBY took sexually explicit images of Victim B.

20. On June 20, 2013, at 11:08 p.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, picturing Victim B, using the email address xxxx.xxxx13@yahoo.com.

21. On June 22, 2013, at 10:39 a.m. and 8:13 p.m., MOSBY and PERRY placed online advertisements on Backpage.com, with sexually explicit images and sexually explicit language, picturing Victim B, using the email address xxxx.xxxx13@yahoo.com.

## Human Trafficking, Conspiracy

22. On June 23, 2013, at 1:00 p.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, picturing Victim B, using the email address xxxx.xxxx13@yahoo.com.

23. On June 23, 2013, MOSBY rented two hotel rooms at the Days Inn in Baltimore, Maryland.

24. On June 25, 2013, at 3:12 p.m. and 8:17 p.m., MOSBY and PERRY placed online advertisements on Backpage.com, with sexually explicit images and sexually explicit language, picturing Victim B, using the email address xxxx.xxxx13@yahoo.com.

25. Under the direction of MOSBY, Victim B was transported to hotels, interacted with men who responded to the Backpage.com advertisements picturing Victim B, and engaged in sexual encounters with the men. As instructed by MOSBY, the money Victim B was paid for the sexual encounters was then given to MOSBY.

Victim C (ET D.O.B. 02/1997, AKA Stacey/Ashley/Mariah)  
& Victim D – juvenile - (RD D.O.B. 08/1997, AKA Kandy)

26. In February 2015, one of MOSBY's associates transported Victim C to the residence of Terra PERRY. Victim C, who was living in Durham, North Carolina, had replied to an advertisement on Backpage.com soliciting "model types" and had been directed [by MOSBY] to travel to Baltimore, Maryland.

27. From February 2015 through September 2015, PERRY provided housing to Victim C, and during this time MOSBY and PERRY placed online advertisements on Backpage.com with sexually explicit images and sexually explicit language featuring Victim C, using email addresses xxxx.xxxx13@yahoo.com and pinkpleasureentertainment@gmail.com, referencing phone number xxx-xxx-6754.

28. On April 29, 2015, MOSBY purchased a one-way train ticket on Amtrak from Hamlet, North Carolina, to Washington, D.C., for a juvenile female, Victim D, who had replied to an advertisement on Backpage.com soliciting "attractive ladies" for an escort service, Pink Pleasure Entertainment. MOSBY used the specific telephone number (xxx-xxx-6754) listed in the advertisement to transmit the train ticket to Victim D.

29. On April 30, 2015, MOSBY retrieved Victim D from the Union Station train terminal in Washington, D.C., and transported her to an Econo Lodge in Clinton, Maryland, where MOSBY had rented a room. MOSBY explained to Victim D that she should have sex with men for money and give the proceeds of these transactions to MOSBY who agreed to give her half the money upon her return to Hamlet, North Carolina.

## Human Trafficking, Conspiracy

30. On April 29, 2015, MOSBY introduced Victim D to Victim C who took photographs of Victim D for the purposes of including them in online listings.

31. On April 30, 2015 at 4:45 p.m., MOSBY and PERRY placed an online advertisement on Backpage.com featuring Victim D, with sexually explicit images and sexually explicit language, using the email address provided in numerous other listings, xxxx.xxxx13@yahoo.com.

32. On May 1, 2015, MOSBY threatened Victim D and told her she could not return to Hamlet, North Carolina, claiming that she remained financially in debt to him.

33. On May 2, 2015 at 7:43 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com featuring Victim D, with sexually explicit images and sexually explicit language, using the email address provided in numerous other listings, pinkpleasureentertainment@gmail.com.

34. On May 1, 2015, MOSBY transported Victim D and Victim C to the Econo Lodge in Laurel, Maryland, where MOSBY had rented a room. The next day, Victim D (the juvenile victim) was instructed by Victim C that when MOSBY was not present, Victim C was in charge and that Victim C would collect proceeds from sexual services performed by Victim D.

35. On May 3, 2015, MOSBY introduced Victim D to Joshua Isaiah JONES (a.k.a. Caddy), who transported Victim D to JONES' home in College Park, Maryland. JONES offered narcotics to Victim D and advised her that she could not return home because she was now in debt to JONES.

36. On May 3, 2015, JONES transported Victim D to Fort Washington, Maryland, and instructed her to charge \$200 for sex acts with a man introduced by JONES, which she did. JONES collected the money from Victim D and told her she could not go home.

37. On May 4, 2015, around midnight, JONES transported Victim D to a home in Fort Washington, Maryland, where JONES instructed her to charge \$200 for sex acts with a man, which she did. JONES collected the money from Victim D, transported her back to his home, and threatened consequences if she refused to continue to accept solicitations from clients.

38. Later on May 4, 2015, JONES transported Victim D to the Comfort Inn in College Park, Maryland, where JONES had rented a room, and advised that he would return once she had gone on enough "dates." JONES subsequently returned and threatened Victim D, forcing her to continue to perform sex acts in exchange for money from men responding to online solicitations.

39. On May 4, 2015, at 4:53 p.m. Victim D placed an online advertisement on Backpage.com featuring herself and charged \$60 for sex acts from a man who responded and met her at the Comfort Inn room rented by JONES.

## Human Trafficking, Conspiracy

40. On May 4, 2015, at the Comfort Inn in College Park, Maryland, rented by JONES Victim D (juvenile) met with an undercover detective (#2242) who, as part of a prostitution sting conducted by the Vice Intelligence Unit of the Prince George's County Police Department, responded to an online advertisement on Backpage.com featuring photographs of Victim D (juvenile) and agreed to pay Victim D \$100 for a half hour of sex acts.

41. On May 4, 2015, in the Days Inn in College Park, Maryland, rented by MOSBY, Victim C met with an undercover detective (#2242) who, as part of a prostitution sting conducted by the Vice Intelligence Unit of the Prince George's County Police Department, responded to an online advertisement on Backpage.com featuring photographs of Victim C and agreed to pay the Victim C \$100 for a half hour of sex acts.'

42. In September 2015, MOSBY physically assaulted Victim C placing her in the hospital for a dislocated shoulder, forcibly transported her from the hospital in Maryland to North Carolina, confiscated her money and credit cards, and abandoned her.

### ADDITIONAL OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

43. On or about and between the dates of January 2013 through December 2015, PERRY posted recruiting advertisements for Pink Pleasure Entertainment, recruited specific racial profiles of victims, created and posted advertisements featuring victims, and housed and transported victims.

44. On January 12, 2013, at 3:56 a.m., and on January 13, 2013, at 11:38 a.m., 12:47 a.m., 5:09 p.m., and 5:14 p.m., MOSBY and PERRY placed online advertisements on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.

45. On February 9, 2013, at 1:08 a.m. and 1:12 a.m., MOSBY and PERRY placed online advertisements on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.

46. On April 3, 2014, at 12:29 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.

47. On May 30, 2013, at 6:49 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.

48. On June 14, 2013, at 1:44 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.

## Human Trafficking, Conspiracy

49. On June 17, 2013, at 11:47 p.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.

50. On December 20, 2013, at 6:16 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com

51. On March 1, 2014, MOSBY rented a hotel room at the Days Inn in Lanham-Seabrook, Maryland.

52. On April 11, 2014, at 2:28 p.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address pinkpleasureentertainment@gmail.com.

53. On April 14, 2014, at 11:52 a.m. and 9:45 p.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.

54. On May 25, 2014, at 10:12 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.

55. On June 23, 2014, MOSBY rented a hotel room at the Days Inn in Baltimore, Maryland.

56. On June 24, 2014, at 7:47 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.

57. On September 17, 2014, at 12:28 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.

58. On October 28, 2014, at 10:47 p.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.

59. On November 7, 2014, MOSBY rented a hotel room at the Ramada Inn in Baltimore, Maryland.

60. On December 21, 2014, at 12:22 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.

## Human Trafficking, Conspiracy

61. On January 8, 2015, at 1:16 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.

62. On January 12, 2015, at 1:49 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.

63. On January 14, 2015 9:19 p.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.

64. On January 14, 2015, MOSBY rented a hotel room at the Knights Inn in Laurel, Maryland.

65. On January 15, 2015, at 8:03 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.

66. On January 19, 2015, at 7:27 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address pinkpleasureentertainment@gmail.com.

67. On January 20, 2015, at 1:19 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.

68. On January 27, 2015, at 6:56 p.m. and 10:15 p.m., MOSBY and PERRY placed online advertisements on Backpage.com, with sexually explicit images and sexually explicit language, using the email address pinkpleasureentertainment@gmail.com.

69. On January 30, 2015, at 6:56 p.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address pinkpleasureentertainment@gmail.com.

70. On January 31, 2015, at 12:31 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address pinkpleasureentertainment@gmail.com.

71. On February 2, 2015, at 8:56 p.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address pinkpleasureentertainment@gmail.com.

72. On February 4, 2015, at 7:21 p.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.



## Human Trafficking, Conspiracy

73. On February 12, 2015, at 8:44 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address pinkpleasureentertainment@gmail.com.

74. On February 23, 2015, at 11:32 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address pinkpleasureentertainment@gmail.com.

75. On March 3, 2015, at 8:19 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com

76. On March 7, 2015, at 8:07 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address pinkpleasureentertainment@gmail.com.

77. On March 12, 2015, at 9:45 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address pinkpleasureentertainment@gmail.com.

78. On March 14, 2015, at 3:33 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com

79. On March 16, 2015, at 7:58 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com

80. On March 17, 2015, at 6:05 p.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address pinkpleasureentertainment@gmail.com.

81. On March 23, 2015, MOSBY rented a hotel room at the Knights Inn in Laurel, Maryland.

82. On March 25, 2015, MOSBY rented a hotel room at the Ramada Inn in Baltimore, Maryland.

83. On March 27, 2015, at 6:23 a.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address pinkpleasureentertainment@gmail.com.

Human Trafficking, Conspiracy

84. On April 1, 2015, at 8:08 p.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com

85. On April 1, 2015, MOSBY rented a hotel room at the Knights Inn in Laurel, Maryland.

86. On April 2, 2015, at 7:34 a.m., and on April 3, 2015, at 7:30 a.m., MOSBY and PERRY placed online advertisements on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.

87. On April 13, 2015, MOSBY rented a hotel room at the Howard Johnson Hotel in Pikesville, Maryland.

88. On April 14, 2015, at 3:42 p.m., 6:09 p.m., and 6:58 p.m., MOSBY and PERRY placed online advertisements on Backpage.com, with sexually explicit images and sexually explicit language, using the email address pinkpleasureentertainment@gmail.com, referencing Pink Pleasure Entertainment and directing replies to xxxx.xxxx13@yahoo.com.

89. On April 15, 2015, MOSBY rented one hotel room for two nights at the Ramada Inn in Baltimore, Maryland.

90. On April 16, 2015, at 8:51 p.m., on April 17, 2015, at 8:30 a.m. and 5:04 p.m., on April 18, 2015, at 10:32 a.m., and on April 19, 2015, at 8:04 a.m., MOSBY and PERRY placed online advertisements on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.

91. On April 24, 2015, at 6:45 p.m. and 7:26 p.m., on April 25, 2015, at 8:46 a.m., 8:49 a.m., 10:09 p.m., and 11:59 p.m., on April 26, 2015, at 8:26 a.m., 8:31 a.m., 4:32 p.m., and 7:20 p.m., and on April 27, 2015, at 8:15 a.m., 8:22 a.m., and 5:17 p.m., MOSBY and PERRY placed online advertisements on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com

92. On April 27, 2015, MOSBY rented one hotel room for two nights at the Ramada Inn in Baltimore, Maryland.

93. On April 28, 2015, at 7:57 a.m., 8:02 a.m., 8:10 a.m., 4:42 p.m., 4:45 p.m., MOSBY and PERRY placed online advertisements on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com

94. On April 29, 2015, MOSBY rented a hotel room at the Econo Lodge in Clinton, Maryland.

## Human Trafficking, Conspiracy

95. On April 29, 2015, at April 29, 2015, at 7:30 a.m. and 7:34 a.m., 5:41 p.m., 5:44 p.m., and 5:55 p.m., and on April 30, 2015, at 7:47 a.m., 7:56 a.m., 7:58 a.m., 4:45 p.m., 5:04 p.m., MOSBY and PERRY placed online advertisements on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com

96. On May 1, 2015, at 12:21 a.m., 9:08 a.m., 9:18 a.m., and on May 2, 2015, at 7:43 a.m., MOSBY and PERRY placed online advertisements on Backpage.com, with sexually explicit images and sexually explicit language, using the email address xxxx.xxxx13@yahoo.com.

97. On May 2, 2015, MOSBY rented one hotel room for two nights at the Ramada Inn in Baltimore, Maryland.

98. On May 3, 2015, at 1:59 p.m., on May 4, 2015, at 2:25 p.m., and on May 5, 2015, at 7:12 p.m., and on May 6, 2015, at 9:03 a.m., MOSBY and PERRY placed online advertisements on Backpage.com, with sexually explicit images and sexually explicit language, using the email address pinkpleasureentertainment@gmail.com.

99. On Friday, May 8, 2015, at 7:52 a.m. and 7:52 a.m., MOSBY and PERRY placed online advertisements on Backpage.com, with sexually explicit images and sexually explicit language, using the email address pinkpleasureentertainment@gmail.com.

100. On May 10, 2015, at 9:07 p.m., MOSBY and PERRY placed an online advertisement on Backpage.com, with sexually explicit images and sexually explicit language, using the email pinkpleasureentertainment@gmail.com and telephone number xxx-xxx-6754.

101. On Wednesday, May 13, 2015, at 8:04 a.m., and on May 14, 2015, at 7:23 a.m., MOSBY and PERRY placed online advertisements on Backpage.com, with sexually explicit images and sexually explicit language, using the email address pinkpleasureentertainment@gmail.com.

102. In May, June, July, and August 2015, MOSBY rented multiple hotel rooms at the Ramada Inn in Baltimore, Maryland and at the Knights Inn in Laurel, Maryland.

103. On December 1, 2015, at 3020 Reisterstown Road in Baltimore, Maryland, MOSBY possessed "Pink Pleasure Entertainment" business cards, a book explaining how to be a "pimp," and pimp paraphernalia.

104. On December 1, 2015 at the District Court for Prince George's County, Maryland, the defendant possessed over \$2,000 in cash on his person;

105. On December 1, 2015, at 1525 Popland Street in Baltimore City, Maryland, PERRY possessed written communications between her and MOSBY concerning their human trafficking enterprise, along with lists of the victims' phone numbers and business transactions and electronic hardware.

[Common Law: CR 11-303] 1C0506

SECOND COUNT

The Grand Jury for the State of Maryland, sitting in Prince George's County, Maryland, upon their oaths and affirmations avers and alleges that RASHID MARWAN MOSBY, on or about and between the dates of January 8, 2013 through February 28, 2013, at various locations throughout the State of Maryland including, but not limited to, Prince George's County, Maryland, did knowingly, take or cause another, to wit: Victim A, AR D.O.B. 04/1990, to be taken to any place for prostitution, in violation of the Criminal Law Article, Section 11-303(a)(1)(i), contrary to the form of the Act of Assembly in such case made and provided, and against the peace, government and dignity of the State.

CR 11-303(a)(1)(i) / CJIS 1-1080  
Penalty 10 years/\$5,000

THIRD COUNT

The Grand Jury for the State of Maryland, sitting in Prince George's County, Maryland, upon their oaths and affirmations avers and alleges that RASHID MARWAN MOSBY, on or about and between the dates of January 8, 2013 through February 28, 2013, at various locations throughout the State of Maryland including, but not limited to, Prince George's County, Maryland, did knowingly, place, cause to be placed, or harbor another, to wit: Victim A, AR D.O.B. 04/1990, in any place for prostitution, in violation of the Criminal Law Article, Section 11-303(a)(1)(ii), contrary to the form of the Act of Assembly in such case made and provided, and against the peace, government and dignity of the State.

CR 11-303(a)(1)(ii) / CJIS 1-1080  
Penalty 10 years/\$5,000

FOURTH COUNT

The Grand Jury for the State of Maryland, sitting in Prince George's County, Maryland, upon their oaths and affirmations avers and alleges that RASHID MARWAN MOSBY, on or about and between the dates of January 8, 2013 through February 28, 2013, in Prince George's County, Maryland, did knowingly persuade, induce, entice, or encourage another, to wit: Victim A, AR D.O.B. 04/1990, to be taken to or placed in any place for prostitution, in violation of the Criminal Law Article, Section 11-303(a)(1)(iii), contrary to the form of the Act of Assembly in such case made and provided, and against the peace, government and dignity of the State.

CR 11-303(a)(1)(iii) / CJIS 1-1080  
Penalty 10 years/\$5,000

FIFTH COUNT

The Grand Jury for the State of Maryland, sitting in Prince George's County, Maryland, upon their oaths and affirmations avers and alleges that RASHID MARWAN MOSBY, on or about and between the dates of January 8, 2013 through February 28, 2013, at various locations throughout the State of Maryland including, but not limited to, Prince George's County, Maryland, did receive or acquire money or proceeds from the earnings of a person engaged in prostitution, to wit: Victim A, AR D.O.B. 04/1990, with the intent to profit from a crime under subtitle 3, in violation of the Criminal Law Article, Section 11-304(a)(2), contrary to the form of the Act of Assembly in such case made and provided, and against the peace, government and dignity of the State.

CR 11-304(a)(2) / CJIS 1-1090  
Penalty 10 years/\$10,000

SIXTH COUNT

The Grand Jury for the State of Maryland, sitting in Prince George's County, Maryland, upon their oaths and affirmations avers and alleges that RASHID MARWAN MOSBY, on or about and between the dates of June 18, 2013 through July 31, 2013, at various locations throughout the State of Maryland including, but not limited to, Prince George's County, Maryland, did knowingly, take or cause another, to wit: Victim B, MA D.O.B. 10/1986, to be taken to any place for prostitution, in violation of the Criminal Law Article, Section 11-303(a)(1)(i), contrary to the form of the Act of Assembly in such case made and provided, and against the peace, government and dignity of the State.

CR 11-303(a)(1)(i) / CJIS 1-1080  
Penalty 10 years/\$5,000

SEVENTH COUNT

The Grand Jury for the State of Maryland, sitting in Prince George's County, Maryland, upon their oaths and affirmations avers and alleges that RASHID MARWAN MOSBY, on or about and between the dates of June 18, 2013 through July 31, 2013, at various locations throughout the State of Maryland including, but not limited to, Prince George's County, Maryland, did knowingly, place, cause to be placed, or harbor another, to wit: Victim B, MA D.O.B. 10/1986, in any place for prostitution, in violation of the Criminal Law Article, Section 11-303(a)(1)(ii), contrary to the form of the Act of Assembly in such case made and provided, and against the peace, government and dignity of the State.

CR 11-303(a)(1)(ii) / CJIS 1-1080  
Penalty 10 years/\$5,000

EIGHTH COUNT

The Grand Jury for the State of Maryland, sitting in Prince George's County, Maryland, upon their oaths and affirmations avers and alleges that RASHID MARWAN MOSBY, on or about and between the dates of June 18, 2013 through July 31, 2013, at various locations throughout the State of Maryland including, but not limited to, Prince George's County, Maryland, did knowingly, persuade, induce, entice, or encourage another, to wit: Victim B, MA D.O.B. 10/1986, to be taken to or placed in any place for prostitution, in violation of the Criminal Law Article, Section 11-303(a)(1)(iii), contrary to the form of the Act of Assembly in such case made and provided, and against the peace, government and dignity of the State.

CR 11-303(a)(1)(iii) / CJIS 1-1080  
Penalty 10 years/\$5,000

NINTH COUNT

The Grand Jury for the State of Maryland, sitting in Prince George's County, Maryland, upon their oaths and affirmations avers and alleges that RASHID MARWAN MOSBY, on or about and between the dates of June 18, 2013 through July 31, 2013, at various locations throughout the State of Maryland including, but not limited to, Prince George's County, Maryland, did receive or acquire money or proceeds from the earnings of a person engaged in prostitution, to wit: Victim B, MA D.O.B. 10/1986, with the intent to profit from a crime under subtitle 3, in violation of the Criminal Law Article, Section 11-304(a)(2), contrary to the form of the Act of Assembly in such case made and provided, and against the peace, government and dignity of the State.

CR 11-304(a)(2) / CJIS 1-1090  
Penalty 10 years/\$10,000

TENTH COUNT

The Grand Jury for the State of Maryland, sitting in Prince George's County, Maryland, upon their oaths and affirmations avers and alleges that RASHID MARWAN MOSBY, on or about May 4, 2015, in Prince George's County, Maryland, did knowingly, place, cause to be placed, or harbor another, to wit: Victim C, ET D.O.B. 02/1997, in any place for prostitution, in violation of the Criminal Law Article, Section 11-303(a)(1)(ii) contrary to the form of the Act of Assembly in such case made and provided, and against the peace, government and dignity of the State.

CR 11-303(b)(1) / CJIS 1-1080  
Penalty 10 years/\$5,000

ELEVENTH COUNT

The Grand Jury for the State of Maryland, sitting in Prince George's County, Maryland, upon their oaths and affirmations avers and alleges that RASHID MARWAN MOSBY, on or about and between the dates of April 11, 2015 through May 5, 2015, at various locations throughout the State of Maryland including, but not limited to, Prince George's County, Maryland, did knowingly, take or cause another, to wit: Victim D, RD D.O.B. 08/1997, a minor, to be taken to any place for prostitution, in violation of the Criminal Law Article, Section 11-303(a)(1)(i) and Section 11-303(b)(1)(a), contrary to the form of the Act of Assembly in such case made and provided, and against the peace, government and dignity of the State.

CR 11-303(a)(1)(i)  
CR 11-303(b)(1)(a) / CJIS 1-0786  
Penalty 25 years/\$15,000

TWELFTH COUNT

The Grand Jury for the State of Maryland, sitting in Prince George's County, Maryland, upon their oaths and affirmations avers and alleges that RASHID MARWAN MOSBY, on or about and between the dates of April 11, 2015 through May 5, 2015, at various locations throughout the State of Maryland including, but not limited to, Prince George's County, Maryland, did knowingly, place, cause to be placed, or harbor another, to wit: Victim D, RD D.O.B. 08/1997, a minor, in any place for prostitution, in violation of the Criminal Law Article, Section 11-303(a)(1)(ii) and Section 11-303(b)(1)(a), contrary to the form of the Act of Assembly in such case made and provided, and against the peace, government and dignity of the State.

CR 11-303(a)(1)(ii)  
CR 11-303(b)(1)(a) / CJIS 1-0786  
Penalty 25 years/\$15,000

THIRTEENTH COUNT

The Grand Jury for the State of Maryland, sitting in Prince George's County, Maryland, upon their oaths and affirmations avers and alleges that RASHID MARWAN MOSBY, on or about and between the dates of April 11, 2015 through May 5, 2015, at various locations throughout the State of Maryland including, but not limited to, Prince George's County, Maryland, did knowingly, persuade, induce, entice, or encourage another, to wit: Victim D, RD D.O.B. 08/1997, a minor, to be taken to or placed in any place for prostitution, in violation of the Criminal Law Article, Section 11-303(a)(1)(iii) and Section 11-303(b)(1)(a), contrary to the form of the Act of Assembly in such case made and provided, and against the peace, government and dignity of the State.

CR 11-303(a)(1)(iii)  
CR 11-303(b)(1)(a) / CJIS 1-0786  
Penalty 25 years/\$15,000

FOURTEENTH COUNT

The Grand Jury for the State of Maryland, sitting in Prince George's County, Maryland, upon their oaths and affirmations avers and alleges that RASHID MARWAN MOSBY, on or about and between the dates of April 11, 2015 through May 5, 2015, at various locations throughout the State of Maryland including, but not limited to, Prince George's County, Maryland, did knowingly, receive or acquire money or proceeds from the earnings of a person engaged in prostitution, to wit: Victim D, RD D.O.B. 08/1997, with the intent to profit from a crime under subtitle 3, in violation of the Criminal Law Article, Section 11-304(a)(2), contrary to the form of the Act of Assembly in such case made and provided, and against the peace, government and dignity of the State.

CR 11-304(a)(2) / CJIS 1-1090  
Penalty 10 years/\$10,000